

KOSHIBA AGENA & KUBOTA

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

MAY 16 2008  
at 5 o'clock and 42 min. M.  
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

STEVEN DECOSTA IN HIS )  
REPRESENTATIVE CAPACITY AS )  
CHAIRPERSON OF THE BOARD )  
OF TRUSTEES OF UNITED )  
PUBLIC WORKERS, AFSCME, )  
LOCAL 646, AFL-CIO, MUTUAL )  
AID FUND TRUST, REAL PARTY )  
IN INTEREST UNITED PUBLIC )  
WORKERS, AFSCME, LOCAL 646, )  
AFL-CIO, )

Plaintiffs, )

vs. )

GARY RODRIGUES, )

Defendant. )

CIVIL NO. CV03-00598 DAE LEK

PLAINTIFFS' MOTION FOR (1)  
PRE-JUDGMENT INTEREST, (2)  
ATTORNEY'S FEES, AND (3)  
COSTS; MEMORANDUM IN  
SUPPORT; DECLARATION OF  
COUNSEL; EXHIBITS "A" – "B"

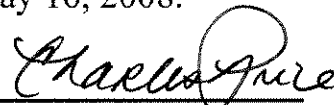
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**PLAINTIFFS' MOTION FOR (1) PRE-JUDGMENT INTEREST,  
(2) ATTORNEY'S FEES, AND (3) COSTS**

Plaintiffs respectfully move for an award of (1) pre-judgment interest, (2) attorney's fees, and (3) costs.

This motion is pursuant to 29 U.S.C. § 1132(g), 28 U.S.C. § 1961(a), Fed. R. Civ. P. Rule 54(d)(1) and (2), Local Rules of the U.S. District Court of the District of Hawaii Rule 54.3, the Findings of Fact and Conclusions of Law ¶ 127, filed March 20, 2008, and is based upon the memorandum in support, declaration, and exhibits filed simultaneously herewith, and such further argument as maybe presented at the hearing hereon.

DATED: Honolulu, Hawaii, May 16, 2008.

  
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CHARLES A. PRICE  
Attorney for Plaintiffs